

To: Water Infrastructure Planning & Delivery Unit,
Department for Environment, Food and Rural Affairs
From: [Friends of the Cam](#)
Date: 12 November 2024

Dear Madam/Sir,

Interested Party Reference number: 20041118

Further to your invitation of October 16th for further Representations from all Interested parties, please find below and attached the response from Friends of the Cam.

Friends of the Cam are an Interested Party to the Application by Anglian Water Services Limited for an Order granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project. We hereby submit our further representations in connection with proposed revisions to the National Planning Policy Framework, specifically in relation to:

- the extent to which the proposed revisions to national planning policy, in particular as regards house building and green belt, are relevant to the determination of the Application; and
- the weight that a decision-maker should attach to the proposed revisions.

The reduced need for housing in Cambridge

We understand that the proposed NPPF will calculate housing need by a new standard method, which will no longer take into account employment led projections. This calculation downwardly revises the current GCLP development strategy calculations from 2463 housing units per year to 2224. This need can amply be fulfilled through sites already available through the 2018 local plan, and the (fully functioning) WWTP site in NE Cambridge is not required to meet housing need.

Point 66 of the NPPF has been amended to specify that 'a mix of affordable housing required meets identified local need'. The majority of housing being built in Cambridge is speculative, and, despite the fast rate of housebuilding in the area (outpacing most of the rest of the UK), prices continue to escalate. The average rental price in October 2024 was reported by the [ONS](#) as being £1702 per month, up 8.6% on 2023, while the average house purchase price for first time buyers of £417,000 was 2.2% higher than in 2023, and significantly higher than the rest of the East of England. Even the 'affordable homes' discount does not bring these properties within the range of people on moderate incomes, let alone those in housing need. These prices are kept high by the marketing of properties overseas, leading to a Council restriction to limit the proportion of such marketing to 25% of any private development. Such levels of speculative development also take their toll on water resources, causing the Environment Agency to object to sizeable new speculative developments, though these objections are routinely discounted.

Greenbelt

The proposed new, relocated, WWTP is to be located on Green Belt land. The amended point 141 in the revised NPPF established that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, and where authorities cannot meet their identified need for housing. As stated above, it is clear that Cambridge has enough already permitted housing development to fulfil its housing need using the new methodology, and therefore there is no justification for moving the WWTP from an urban site to high quality green belt land. The proposed site has high agricultural, landscape and historical merit and can, in no way, be considered 'grey belt'.

Water

The section of the NPPF on Meeting the Challenge of climate change, flooding and coastal change, and on sustainable development, have not been amended. Given the huge changes in climate conditions and risks, this is interesting. The past year has seen significant flooding in the area, and it should be borne in mind that the relocation site for the WWTP lies between 6 and 8 meters above sea level. Point 166 of the NPPF specifies that planners take account of the Environment Agency. As well as objecting to large new housing developments on the basis of insufficient water, the EA stated at the public inquiry that the new WWTP would increase flood risk and that the new plant is likely to cause detriment, overall.

The weight that a decision-maker should attach to the proposed revisions

Friends of the Cam believes that the revisions to the NPPF reinforce the illogicality of allowing the WWTP to be relocated from its current urban site in Cambridge, to high quality Green Belt land. The housing already allowed for under the local plan is sufficient to provide the number of new homes identified as required, although these are too expensive and building more does not reduce prices. Other measures than numerical, speculative development are required to address real and affordable housing need. Neither the relocation of an efficiently functioning WWTP nor the building of still more housing on a vacated, contaminated, urban site, is required, which the NPPF and its revisions reinforces. On this basis, the construction of a new WWTP cannot be considered a nationally significant infrastructure project, and the application should be refused.

Yours sincerely,

Susan Buckingham
on behalf of [Friends of the Cam](#)

